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Proposed Counsel for Debtor
Ivory Trading Company, Inc. dba Ivory Headwear
Co.

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF OREGON

In re
Ivory Trading Company, Inc. dba Ivory
Headwear, Co.
Debtor.

Ivory Trading Company, Inc. dba Ivory
Headwear Co.,

Plaintiff,

v.

The Bank of the West,

Defendant.

Case No. 15-32026-pcm11

Adv. Proc. No.

**MOTION FOR TEMPORARY
RESTRAINING ORDER**

By Plaintiff Ivory Trading Company, Inc.

EXPEDITED HEARING REQUESTED

Pursuant to 11 U.S.C. § 105(a) and Fed. R. Bank. P. 7001(7) and 7065, Debtor and
Plaintiff Ivory Trading Company, Inc. dba Ivory Headwear, Co. ("Plaintiff" or "Debtor") move
this Court for a temporary restraining order:

1. Prohibiting Defendant Bank of the West ("Defendant") their agents, servants,
employees, attorneys and those persons in active concert or participation with them from

1 undertaking or pursuing any collection efforts against Mr. Michael P. Ivory, pending a hearing
2 and this Court's ruling on the Order to Show Cause Why a Preliminary Injunction Should Not
3 Issue; and,

4 2. Staying Defendant's threat to record a Confession of Judgment in state court
5 against Debtor and Mr. Michael P. Ivory, pending a hearing and this Court's ruling on the Order
6 to Show.
7

8 The Temporary Restraining Order would remain in effect until the Court has an
9 opportunity to conduct a hearing and issue its ruling on the Debtor's request for a preliminary
10 injunction.

11 This Motion is supported by Plaintiff's Adversary Proceeding Complaint, the
12 accompanying Memorandum of Law, and the Declaration of Michael P. Ivory filed herein.
13

14 DATED: April 24, 2015

PERKINS COIE LLP

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16 By: /s/ Douglas R. Pahl
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